

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

UNITED STATES OF AMERICA

v.

EDWARD CONSTANTINESCU

No. 4:22-CR-00612-S

**DEFENDANT EDWARD CONSTANTINESCU'S  
MOTION FOR SHORT EXTENSION TO DISCLOSE EXPERT TESTIMONY**

Edward Constantinescu respectfully requests that the Court permit him a short extension of time to obtain and disclose expert witnesses in this case. In short, Constantinescu respectfully requests additional time to provide disclosures in light of the government's 900+ trial exhibits, to which the government first provided access on Monday, August 14<sup>th</sup>—one day before the defense deadline to disclose expert witnesses. Constantinescu seeks this requested relief in light of (1) his currently pending motion to sell three of his properties so he can fund his complete defense, including witnesses who may testify as experts; and (2) the government's recent disclosure of exhibits and additional productions.

As detailed more extensively in his recently filed Motion to Permit the Sale of Property to Assert His Sixth Amendment Rights, (ECF No. 354), Constantinescu is respectfully seeking leave of the Court to sell three of his properties to, in part, fund and present a complete defense, one of his Sixth Amendment rights. *See United States v. Stanford*, 823 F.3d 814, 836 (5th Cir. 2016). Constantinescu anticipates that the sale of the properties will provide him with liquidity to hire an expert in this case, and respectfully requests additional time on that basis.


Second, Constantinescu requests additional time to procure expert testimony in light of the government's belatedly produced trial exhibits. On top of the tens of millions of pages the

government has produced through the course of this case, Constantinescu first received access to over nine hundred of the government's trial exhibits on August 14, 2023—three days after the Court's deadline. The government's trial exhibits include numerous documents that the government did not previously produce to the defense. Moreover, yesterday, on August 16, 2023, the government sent a production letter explaining that it is producing even more records pertaining to several of its expert witnesses and the lead testifying case agent. These records apparently will include processed social media data created and/or examined by one of the government's witnesses.

Accordingly, Constantinescu respectfully requests an additional 21 days to retain and disclose expert testimony in this case. A proposed order is being submitted with this request.

Dated: August 17, 2023

Respectfully submitted,

A handwritten signature in black ink that reads "Jamie H. Solano". The signature is written in a cursive, flowing style. The first name "Jamie" is written with a large, looping capital "J". The middle initial "H." is written in a smaller, simpler font. The last name "Solano" is written with a large, looping capital "S" and a trailing flourish.

Matthew A. Ford  
Texas Bar No. 24119390  
mford@fordobrien.com  
Jamie Hoxie Solano  
Admitted Pro Hac Vice  
jsolano@fordobrien.com  
FORD O'BRIEN LANDY, LLP  
3700 Ranch Road 620 South, Suite B  
Austin, Texas 78738  
Telephone: (512) 503-6388  
Facsimile: (212) 256-1047

Attorneys for Defendant  
Edward Constantinescu

**CERTIFICATE OF CONFERENCE**

I hereby certify that on August 17, 2023, I emailed government counsel to obtain their position on the relief requested herein and obtained confirmation that the government objects to the requested extension.

/s/ Jamie H. Solano  
Jamie H. Solano

**CERTIFICATE OF SERVICE**

I hereby certify that on August 17 2023, a true and correct copy of the foregoing document has been electronically served on all counsel of record via the Court's CM/ECF system.

/s/ Jamie H. Solano  
Jamie H. Solano